



**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

FREDDIE G. JONES,

Plaintiff,

v.

UNIPRES U.S.A., INC.,

Defendant.

)
)
)
)
)
)
)
)
)
)
)

Civil Action No. 3:12-CV-01089

JUDGE TRAUGER

MAGISTRATE JUDGE BRYANT

JURY DEMAND

**MOTION OF DEFENDANT UNIPRES, U.S.A., INC., FOR PERMISSION TO FILE
SUPPLEMENTAL MEMORANDUM**

Defendant Unipres U.S.A., Inc., (“Unipres”) respectfully requests permission to file its supplemental memorandum (Docket No. 19) regarding its Motion to Dismiss (Docket No. 5) today, instead of January 4, 2013, as provided in this Court’s Order of December 20, 2012, (Docket No. 17). Counsel for Unipres simply requests the Court’s grace for the one business day extension of time. Moreover, since Defendant’s Supplemental Memorandum concludes that Plaintiff’s amended pleading relates back to the date the original complaint was filed under its reading of relevant authority, the one-business-day delay in filing is not material. Further, Plaintiff is not prejudiced by this one-business-day extension.

Respectfully submitted,

/s/ M. Clark Spoden

M. Clark Spoden

James B. Johnson

STITES & HARBISON, PLLC

401 Commerce Street, Suite 800

Nashville, TN 37219

615-782-2343

Attorneys for Defendant Unipres U.S.A., Inc.